

## REMARKS

Claims 3 and 11 were previously cancelled without prejudice and claims 1, 2, 4-6, 10, 12-15, and 23-28 were previously withdrawn. Claims 7-9 and 16-22 remain pending in the application, for a total of ten (10) pending claims. Claims 7 and 8 are independent claims, while claims 9 and 16-22 are dependent claims.

The Patent Office has withdrawn the previous rejections and has now rejected all of the pending claims (claims 7-9 and 16-22) under 35 U.S.C. § 103 as being unpatentable (obvious) over Tawara et al. (US 2003/0050876). Applicants submit that Tawara does not obviate the current claims because Tawara does not teach or suggest all of the claim limitations of any of the pending claims. Specifically, Applicants submit that Tawara does not teach or suggest, for example, "at least one of debiting and crediting a plurality of ledger balances using a posting matrix containing 0, 1, and -1 values" as recited in claim 7, or "posting the derived accounting information to at least one ledger balance for the account wherein the posting is performed utilizing a posting matrix" as recited in claim 8.

The Patent Office admits on page 2 of the office action that "[t]he prior art lack the specific teaching of the limitation of debiting and crediting a plurality of ledger balances using a posting matrix containing 0, 1, and -1." However, the Patent Office states that "Tawara et al. teach a similar posting system utilizing numbers (i.e., 1 and 2) to symbolize credits and debits". Further, the Patent Office states that "[i]t would have been an obvious design choice to one of ordinary skill in the accounting art to utilize a posting matrix specifically containing numerals 0, 1, and -1 in order to account for debits/credits positively, negatively, or not at all."

Applicants submit that the differences between the systems and methods that Tawara concerns and the present invention is much more significant than an obvious design choice or the simple selection of different numbers to represent different mathematical operations. In Tawara, the numbers 1 and 2 serve as a flag to trigger execution of certain code. For example, as recited in paragraph 0075 of Tawara, "[i]f the `credit/debit section=1`, then the retrieved `account title code` is stored as a `debit

account title` of the accounting information. If the `credit/debit section=2`, then it is stored as a `credit account title`.” In contrast, in the current application, as recited in paragraph 0042, as an example, “[u]pdates are performed through matrix multiplication in which data of the fields of the transaction event are multiplied by the posting matrix.” Thus, even though limitations from the specification are not to be read into the claims, Applicants submit that Tawara does not teach or suggest a “posting matrix” that is consistent with how that phrase is used in the current application and as recited in each of the independent claims. In fact, Tawara does not teach or suggest the use of any type of a “matrix”. Nor does Tawara teach or suggest the limitations of the current independent claims using different nomenclature, for example.

Applicants further submit that Tawara’s use of numbers as flags teaches away from the use of a matrix. Specifically, Tawara teaches that flags should be used, and does not mention that using a posting matrix or matrix operations would be options to consider. In addition, to the extent that Tawara teaches that using flags is the accepted wisdom, the use of a posting matrix in the current claims is contrary to such accepted wisdom, which is further evidence of non-obviousness. Moreover, if Tawara were to be modified to arrive at the present invention, the use of a posting matrix in Tawara would impermissibly change the principle of operation of Tawara from the use of flags as indicators to the use of a matrix suitable to perform matrix operations. And furthermore, the system of Tawara would not work satisfactorily for its stated purpose if Tawara were to be modified to use its flag values of 1 and 2 as a posting matrix since the flag values of 2 would change the value of the output if matrix operations were performed.

Further, Applicants submit that no motivation has been identified, or is apparent, either from Tawara or from the knowledge of a person of ordinary skill in the art to modify Tawara to use a posting matrix rather than a selection of flags. For example, Tawara does not suggest that some advantage or expected benefit would result from the use of a posting matrix rather than a selection of flags. And no alternative motivation has been identified to establish a prima facie case of obviousness.

Thus, Applicants submit that none of the references cited to date teach or suggest a posting matrix as recited in these claims. Consequently, the prior art of record does not teach or suggest all of the claim limitations of any of the currently pending claims. Applicants further submit that many of the claims may contain other limitations not taught or suggested by the prior art of record. Therefore, Applicant submits that the present invention would not have been obvious at the time it was made based on the prior art of record.

Accordingly, Applicants respectfully request reconsideration of the application and allowance of all pending claims. Should the Examiner wish to discuss any of the above in greater detail or deem that further amendments should be made to improve the form of the claims, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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By: 

Allan W. Watts  
U.S. Reg. No. 45,930  
Bryan Cave LLP  
One Renaissance Square  
Two North Central Avenue, Suite 2200  
Phoenix, AZ 85004-4406  
allan.watts@bryancave.com  
Direct: 602-364-7331  
Fax: 602-716-8331

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Printed Name: Donna L. Miranda